

Exhibit 16

Exhibit 16



Russell Zwerin <rzwerin@argolub.com>

Re: Brian Donnelly AKA KAWS and KAWS Inc., v. Jonathan Anand, et. al. Civil Action No. 21-cv-09562-PKC

1 message

Sanjay Chaubey <chaubeylaw@gmail.com>

Thu, Apr 27, 2023 at 1:45 PM

To: Nehemiah Glanc <nglanc@argolub.com>

Cc: Russell Zwerin <rzwerin@argolub.com>, Linda DiLeva <ldileva@argolub.com>

Good afternoon,

Pursuant to the telecon on Thursday, April 20, 2023, please note Defendant's responses:

1. For document request, the Defendants do not possess any such documents and will provide an affidavit for the same.
2. For interrogatories, jonathananand@gmail.com is the correct email address.

Thank you,
Sue
Associate Lawyer

Law Offices of Sanjay Chaubey

.....
Please Note Our New Address Below:

Law Offices of Sanjay Chaubey
[420 Lexington Avenue, Suite 2148](#)
[New York, NY 10170](#)
Phone: 212-563-3223
Fax: 212-563-4534

On Tue, Apr 18, 2023 at 1:27 PM Sanjay Chaubey <chaubeylaw@gmail.com> wrote:

Good afternoon,

I have scheduled the telecon for 2.00 p.m., Thursday, April 20, 2023.

Thank you,
Sue
Associate Lawyer

Law Offices of Sanjay Chaubey

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On Tue, Apr 18, 2023 at 12:42 PM Nehemiah Glanc <nglanc@argolub.com> wrote:

2pm on Thursday 4/20?

Thank you. -Nehemiah Glanc-

Nehemiah S. Glanc
Aaron Richard Golub, Esquire, P.C.
[24 East 64th Street](#)
Fifth Floor
New York, New York 10065
Ph: 212-838-4811

Fx: 212-838-4869
email: nglanc@argolub.com

On 4/18/23 12:40 PM, Sanjay Chaubey wrote:

Dear Mr. Glanc
Thursday afternoon on April 20 is okay with me
Thank you,
Sanjay Chaubey, Esq.

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New York, NY 10170
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Fax: 212-563-4534

On Tue, Apr 18, 2023 at 10:01 AM Nehemiah Glanc <nglanc@argolub.com> wrote:

Dear Mr. Chaubey: Pursuant to FRCP 37(a)(1) and Judge Castel's Individual Practices, are you available this Thursday (4/20) morning or afternoon or Friday (4/21) late morning or early afternoon to discuss by telephone the deficiencies of your discovery responses?

Thank you. -Nehemiah Glanc-

Nehemiah S. Glanc
Aaron Richard Golub, Esquire, P.C.
[24 East 64th Street](#)
Fifth Floor
New York, New York 10065
Ph: 212-838-4811
Fx: 212-838-4869
email: nglanc@argolub.com

On 4/10/23 12:58 PM, Sanjay Chaubey wrote:

Dear Mr. Glanc:

Find attached the following:

1. Defendants' Response to Plaintiff's First Request for Admission
2. Defendants' Response to Plaintiff's First Set of Document Request
3. Defendants' Response to Plaintiff's First Set of Interrogatories

Thank you,
Sanjay Chaubey, Esq.

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Fax: 212-563-4534